

Removing the "established business relationship" qualification from the fax regulations is absolutely bad for association business, forcing us to obtain the written consent of our own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature, including invitations to annual or quarterly meetings since members must register and pay for some of those meetings. The association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership, for example. Not-for-profit organizations should be exempt from the new rules or there should at least be some provision to where faxes can be sent to associations' members under an established business relationship clause.